

REMARKS

Claims 1-48 remain pending in the application. Reconsideration of the present case is earnestly requested in light of the following remarks.

Provisional Double Patenting Rejection:

The Examiner provisionally rejected claims 1-48 on the ground of non-statutory double patenting over claims 1-32 of Application No. 10/091,203. In the event that the instant Application or the copending Application issues, Applicants will present arguments or file a terminal disclaimer to obviate the double patenting rejection.

The Examiner also provisionally rejected claims 1-48 on the ground of non-statutory double patenting over claims 1-11, 21-26, 28-35 and 37-38 of Application No. 10/090,893. In the event that the instant Application or the copending Application issues, Applicants will present arguments or file a terminal disclaimer to obviate the double patenting rejection.

Section 103(a) Rejection:

The Examiner rejected claims 1-48 under 35 U.S.C. § 102(e) as anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as obvious over Mansour et al. (U.S. Publication 2002/0111995).

Regarding claim 1, contrary to the Examiner's assertion, Mansour fails to teach or suggest that the server is further configured to plug a converter module into a framework configured to accept one or more pluggable modules. In the instant Office Action, the Examiner cited paragraphs [0022]-[0024] and paragraph [0055] of Mansour. However, neither these paragraphs, nor any others in Mansour, mention the above-recited limitation or pluggable converter modules at all. Instead, paragraphs [0022]-[0024] provides a summary of the invention disclosed by Mansour, and paragraph

[0055] teaches that various devices may be used in conjunction with the invention, e.g., cell phones, PDAs, etc. Overall, Mansour discloses a method for providing a user-interface (UI) to a device which corresponds to one of various applications in a variable networking environment, i.e., one that may lose and regain connectivity often. To achieve this, Mansour describes that the server may execute an application and provide a UI form and corresponding data for insertion into the form. As an example, paragraphs [0066]-[0078] describe how the server may provide a UI of an email application and a document application to a device. More specifically, paragraph [0072] states:

As described above, an email UI generated by a client device can be considered to be an application facade, and although the controls can be used for simple data manipulation, the UI is not actually an email client. The actual email application is server-based and is executed by the UI server, and preferably only the source data items are transmitted to the UI form (and in most cases only enough to fill the current view supported by the client UI).

Regarding the document application, paragraph [0077] discloses:

In accordance with one aspect of the present invention, the client device can be suitably configured to edit data in "chunks" or small quantities without having an entire file. Thus, a portion of a document can be downloaded to a client device for editing while the remainder of the document is kept at the UI server and/or while other portions of the document are being downloaded. From the end user's perspective, it will appear as though the entire document or data item resides at the client device. This feature may also allow an edited portion or chunk of data to be sent back to the UI server for updating in conjunction with the appropriate server-based application.

Thus, in Mansour, the UI server may transmit information to the client device to fill out portions of a UI form corresponding to the application that is requested by the user. Applicants assert that Mansour nowhere discloses the one or more pluggable converter modules or a framework to accept them as recited in the claims. More particularly, Applicants assert that Mansour fails to teach or suggest that *the server is further configured to plug a converter module into a framework configured to accept one or more pluggable modules*. Moreover, Applicants assert that the Examiner has failed to provide any pertinent citation or indication whatsoever as to how Mansour teaches this feature of claim 1. Thus, for at least the reasons provided above, Applicants assert that Mansour fails to teach this feature of claim 1.

Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). For at least the reasons above, the rejection of claim 1, and those claims dependent therefrom, is not supported by the cited art and removal thereof is respectfully requested.

Regarding claim 3, Mansour fails to disclose **wherein the converter module is further configured to exclude one or more format features of the document in the server format from the document in the small device format**. Regarding this claim, the Examiner cites paragraph [0217] and paragraphs [0053]-[0218]. Applicants assert that paragraph [0217] discloses how a user may interact with a client device to launch various server applications over the Internet. As an example, a portion of paragraph [0217] recites:

For example, the end user can establish a connection with the TA server 2404, enter login data, launch and terminate server-based applications, switch between server-based applications, manipulate action controls rendered on the user interface 2412, manipulate display controls rendered on the user interface 2412, enter and edit data items associated with the user interface 2412, and perform other operations via the user interface 2412.

Clearly, this is irrelevant with respect to the recited feature of claim 3 above. Nowhere in this paragraph, nor anywhere else, does Mansour teach exclusion of format features of the document as recited in claim 3. Regarding the citation of paragraphs [0053]-[0218], Applicant reminds the Examiner that, according to the MPEP 706, "The goal of examination is to clearly articulate any rejection early in the prosecution process so that the applicant has the opportunity to provide evidence of patentability and otherwise reply completely at the earliest opportunity". Additionally, 37 CFR 1.104 states:

When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly

as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.

Applicant therefore requests that the Examiner more particularly point out which section of Mansour teaches this feature of claim 3 and provide a clear explanation of the rejection.

Thus, for at least the reasons above, the rejection of claim 3 is not supported by the prior art and removal thereof is respectfully requested.

Independent claims 29 and 42 include similar limitations as claim 1, and so the above arguments apply with equal force to claims 29 and 42. Furthermore, as shown above in regard to claim 3, the cited art does not disclose *excluding one or more format features* of the office document from the small device document. Thus, for at least the reasons provided above, the rejection of claims 29 and 42, and those claims dependent therefrom, is not supported by the prior art and removal thereof is respectfully requested.

Claim 16 has similar limitations as claim 1, and so the above arguments regarding claim 1 apply with equal force to claim 16. Furthermore, claim 16 recites: **a framework configured to receive pluggable converter modules configured to convert documents in one or more office document formats to and from one or more small device document formats and plug one of the converter modules into the framework.** As argued above, Mansour fails to disclose a pluggable converter module. Also, as indicated above, Mansour fails to disclose plugging one of the converter modules into the framework. Moreover, Applicants also submit that Mansour fails to disclose *a framework configured to receive pluggable converter modules (plural)*. Thus, Applicants submit that Mansour fails to disclose *a framework configured to receive pluggable converter modules configured to convert documents in one or more office document formats to and from one or more small device document formats*.

For at least the reasons above, the rejection of claim 16, and those claims

dependent therefrom, is not supported by the prior art and removal thereof is respectfully requested.

Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and prompt notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-10600/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Other:

Respectfully submitted,



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